

DAVID C. ANDERSEN (State Bar No. 194095)
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**UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ROSE HEFNER AS PERSONAL	:	
REPRESENTATIVE OF	:	<u>Case No. 3:07-cv-06050-JL</u>
IRVING HEFNER (DECEASED)	:	
	:	
DEBORAH CITRANO JOHNSON	:	DECLARATION OF
AS PERSONAL	:	DAVID C. ANDERSEN IN
REPRESENTATIVE OF	:	SUPPORT OF PLAINTIFFS'
STEPHEN CITRANO	:	MOTION FOR REMAND
(DECEASED)	:	AND SUPPORTING MEMORANDUM
	:	
v.	:	
	:	
SMITHKLINE BEECHAM	:	
CORPORATION	:	
d/b/a GLAXOSMITHKLINE and	:	
MCKESSON CORPORATION	:	
	:	
<u>Defendants</u>	:	

THIS DOCUMENT RELATES TO:

*UPSHAW v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSEON CORPORATION, Case No. 3:07-cv-05891-MHP*
*HALL v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSON CORPORATION, Case No. 3:07-cv-05887-JL*
*FISHER v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSON CORPORATION, Case No. 3:07-cv-05889-MMC*
*JEFFERSON v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSON CORPORATION, Case No. 3:07-cv-05888-SC*
*THORNTON v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSON CORPORATION, Case No. 3:07-cv-05890-JL*
*BONE, ET AL v. SMITHKLINE BEECHAM CORPORATION D/B/A GLAXOSMITHKLINE and
MCKESSON CORPORATION, Case No. 3:07-cv-05886-MHP*

1 I, DAVID C. ANDERSEN, declare:

2 1. I am an attorney admitted to practice before all courts of the State of California and
3 am an Associate with The Miller Firm, LLC, attorneys for Plaintiffs in this action. I make this
4 Declaration based on my personal knowledge, in support of Plaintiff's Motion For Remand And
5 Supporting Memorandum. I would and could competently testify to the matters stated in this
6 Declaration if called as a witness.

7 2. A true and accurate copy of Notice of Ruling with attached Revised Ruling on
8 Request for Reconsideration by Judge Victoria Chaney), *Vioxx Cases*, California Superior Court for
9 Los Angeles County, Case No. JCCP 4347, filed on or about May 22, 2006, attached as **Exhibit A**.

10 3. A true and accurate copy of *Reid, et al., v. Merck & Company, Inc., et al.*, Case No.
11 CV 02-00504 NM (RZx) attached as **Exhibit B**.

12 4. A true and accurate copy of *Black, et al., v. Merck & Company, Inc., et al.*, Case No.
13 CV 03-8730 NM (AJWx) attached as **Exhibit C**.

14 5. A true and accurate copy of *Albright, et al. v. Merck & Co., Inc., et al.*, No CV 05-
15 4025 JFW (MANx) attached as **Exhibit D**.

16 6. A true and accurate copy of *Aaroe, et al., v. Merck & Co., Inc., et al.*, No CV05-
17 5559 JFW (CWx) attached as **Exhibit E**.

18 7. A true and accurate copy of *Maher v. Novartis Pharmaceuticals Corp., et al.*, No.
19 07-852 WQH (JMA) attached as **Exhibit F**.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on this 7th day of December, 2007, in Orange, Virginia.
22

Dated: December 7, 2007

Respectfully submitted,

/s/

David C. Andersen (Bar No. 194095)

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Attorneys for Plaintiff

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